

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Part 101 of the Commission's	)	WT Docket No. 10-153
Rules to Facilitate the Use of Microwave for	)	
Wireless Backhaul and Other Uses and to	)	
Provide Additional Flexibility to Broadcast	)	
Auxiliary Service and Operational Fixed	)	
Microwave Licensees	)	RM-11602
	)	
Petition for Rulemaking filed by Fixed	)	
Wireless Communications Coalition to Amend	)	
Part 101 of the Commission's Rules to	)	
Authorize 60 and	)	
80 MHz Channels in Certain Bands for	)	
Broadband Communications	)	

To: The Commission

**COMMENTS OF THE  
WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION**

The Wireless Internet Service Providers Association ("WISPA"), hereby submits Reply Comments addressing certain of the Comments filed in response to the August 9, 2011 *Further Notice of Proposed Rulemaking* in the above-captioned proceeding.<sup>1</sup> As further discussed below, WISPA agrees with the majority of commenters that endorse the use of smaller antennas for Category B antennas in the 6 GHz band and the relaxing of payload requirements in "rural areas."

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<sup>1</sup> Amendment of Part 101 of the Commission's Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licensees; Report and Order, *Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order*, FCC 11-20, WT Docket No. 10-153 (rel. Aug. 9, 2011) ("*FNPRM*").

## Introduction

WISPA, the trade association representing the interests of the fixed wireless broadband industry, commends the Commission for making spectrum in the 7 GHz and 13 GHz bands available for wireless backhaul. In addition, WISPA is pleased that the Commission adopted WISPA's proposal to allow wider channels in these bands to increase capacity and throughput. Taken together, these rule changes will enable wireless Internet service providers ("WISPs") to access much-needed, high-capacity spectrum for wireless backhaul. WISPA submits these Reply Comments to support further changes that will lower deployment costs and reduce administrative burdens associated with seeking waiver of the payload requirements.

## Discussion

### **I. THE COMMISSION SHOULD AMEND ITS PART 101 ANTENNA STANDARDS TO ALLOW FOR SMALLER CATEGORY B ANTENNAS.**

WISPA agrees with those commenters that support the use of smaller, lower-gain antennas in the 6 GHz band, in particular Comsearch's proposal to amend Section 101.115(b) to permit 3-foot antennas as an alternative Category B antenna.<sup>2</sup> Several commenters, both in Comments filed in response to the *FNPRM* and in the proceeding below, point out that smaller and lighter antennas would be less expensive to manufacture,<sup>3</sup> reduce tower and rooftop rental fees<sup>4</sup> and installation costs,<sup>5</sup> create more

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<sup>2</sup> See Comments of Comsearch, WT Docket No. 10-153, filed Oct. 4, 2011 ("Comsearch Comments"), at 2.

<sup>3</sup> See Comments of FiberTower Corporation, WT Docket No. 10-153, filed Oct. 4, 2011 ("FiberTower Comments"), at 3.

<sup>4</sup> See Comments of the Fixed Wireless Communications Coalition, WT Docket No. 10-153, filed Oct. 4, 2011 ("FWCC Comments"), at 3; Comments of PCIA – The Wireless Infrastructure Association, WT Docket No. 10-153, filed Oct. 4, 2011 ("PCIA Comments"), at 4; Comments of Wireless Strategies, Inc., WT Docket No. 10-153, filed Oct. 4, 2011, at 1; FiberTower Comments at 3.

<sup>5</sup> See *id.*

suitable sites,<sup>6</sup> reduce wind loading<sup>7</sup> and, as FiberTower puts it, facilitate savings throughout the “entire logistical chain.”<sup>8</sup> By contrast, the existing “rules requiring larger antennas in these bands can result in deployment delays, increased deployment costs, major structural modifications to the tower, and/or decreased capacity and service availability.”<sup>9</sup> No commenter objected to allowing smaller antenna sizes, and the Commission therefore should amend its rules to allow 3-foot dishes in the 6 GHz band.

WISPA agrees with both Comsearch and FWCC that the rules allowing smaller antennas should not replace the existing Category B standards, but rather should be an *alternative* Category B standard.<sup>10</sup> As FWCC notes, “[m]anufacturers and operators would be free to meet either standard (unless required to meet category A).”<sup>11</sup> The specific language proposed by Comsearch will ensure that, going forward, operators that are not required to use Category A antennas can deploy either Category B1 or Category B2 antennas.

## **II. THE COMMISSION SHOULD REDUCE THE PAYLOAD REQUIREMENTS FOR “RURAL AREAS.”**

WISPA also agrees with FWCC and FiberTower that the Commission should lower the minimum traffic loading payload percentages for “rural areas.”<sup>12</sup> As FWCC states, “[s]parse traffic and greater distances make it impractical to maintain minimum

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<sup>6</sup> See Comments of Clearwire Corporation, WT Docket No. 10-153, filed Oct. 4, 2011 (“Clearwire Comments”), at 7; Comments of MetroPCS Communications, Inc., WT Docket No. 10-153, filed Oct. 4, 2011 (“MetroPCS Comments”), at 5; PCIA Comments at 3.

<sup>7</sup> See MetroPCS Comments at 5.

<sup>8</sup> FiberTower Comments at 3.

<sup>9</sup> Clearwire Comments at 6.

<sup>10</sup> See Comsearch Comments at 2; FWCC Comments at 3.

<sup>11</sup> *Id.*

<sup>12</sup> WISPA does not object to using the definition of “rural areas” adopted in WT Docket No. 02-381, i.e., “those counties or equivalent) with a population density of 100 persons per square mile or less, based upon the most recently available Census data.” See *FNPRM* at 35.

traffic loading in rural areas,”<sup>13</sup> and as FiberTower observes, relaxing payload requirements would “incentivize the introduction of backhaul service to those areas.”<sup>14</sup> Given that the Wireless Telecommunications Bureau has “historically” granted waivers of the payload requirements,<sup>15</sup> the Commission should take the next step and replace the waiver process with an exemption for “rural areas” from compliance with the payload requirements, thereby eliminating the need for parties to seek individualized waivers and for Commission staff to process those waiver requests.

### **Conclusion**

WISPA supports adoption of rules allowing smaller antennas in the 6 GHz band relaxed traffic loading payload requirements in “rural areas.”

Respectfully submitted,

**THE WIRELESS INTERNET  
SERVICE PROVIDERS ASSOCIATION**

October 25, 2011

By: */s/ Elizabeth Bowles, President*  
*/s/ Jack Unger, Chair of FCC Committee*

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<sup>13</sup> FWCC Comments at 5.

<sup>14</sup> FiberTower Comments at 4.

<sup>15</sup> *FNPRM* at 34.